

Atul C. Shah, MD
2884 Manorwood Drive
Troy, Michigan 48085
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Keith Martorana, Esq.
Gibson, Dunn & Crutcher LLP
Wilmington Trust Company as
GUC Trust Administrator
200 Park Avenue, 47th Floor
New York, New York 10166

Ref: Response to Omnibus Reply by Atul C. Shah, MD.

Dear Keith Martorana:

Good Morning

I received the Hard Copy of the Omnibus Reply of Wilmington Trust Company as GUC Trust Administrator and Trustee from Garden City Group, LLC dated June 26, 2015.

Now, I am forwarding my "Response to Omnibus Reply" in Hard Copy and Email copy to your office, to the United States Bankruptcy Court and the Defendant Attorneys.

Please keep me informed of the future updates of this civil case.

Sincerely,

Atul C. Shah, MD
Pro Se Litigant
2884 Manorwood Drive
Troy, Michigan 48085

June 29, 2015

Hearing Date and Time: July 01, 2015 at 9.45 a.m. (Eastern Time)
Objection Deadline: June 24, 2015 at 4.00 p.m. (Eastern Time)

Atul C. Shah, MD
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Representing Himself (Atul C. Shah) for
MLC GUC Claim No. 28820 filed by Atul Shah

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X		
In re		
Motors Liquidation Company, et al.,		Chapter 11 Case No
f/k/a General Motors Corp., et al.		09-50026 (REG)
		(Jointly Administered)
Debtors.		
-----X		

**RESPONSE TO THE OMNIBUS REPLY OF WILMINGTON TRUST
COMPANY, AS GUC TRUST ADMINISTRATOR AND TRUSTEE, TO
RESPONSES RECEIVED IN RESPECT OF THE GUC TRUST
ADMINISTRATOR'S MOTION FOR AN ORDER GRANTING
AUTHORITY (A) TO EXERCISE NEW GM WARRANTS AND
LIQUIDATE NEW GM COMMON STOCK AND (B) TO MAKE
CORRESPONDING AMENDMENTS TO THE GUC TRUST
AGREEMENT (C) REQUESTING RELIEF SOUGHT FOR CREDITOR
ATUL C. SHAH (D) REQUESTING THAT THIS HISTORIC CIVIL
CASE BY ATUL C. SHAH HAS EXCELLENT MERITS**

Introduction

This is a Response to the Omnibus Reply of Wilmington Trust Company as GUC Trust Administrator and Trustee dated June 26, 2015 by the Plaintiff and Pro Se Litigant Atul C. Shah, MD.

As an introduction and here comes, Atul C. Shah, MD a Plaintiff and Pro Se Litigant against the Motor Liquidation Company et al., f/ka/a General Motors Corp., et al since December 2008.

Atul C. Shah, Petitioner v. Motor Liquidation Company GUC Trust Civil Case Number 14-830 has been docketed with the Supreme Court of the United States on January 14, 2015.

Atul C. Shah, MD has been listed as the Creditor with the Consolidated List of Creditors at the United States Bankruptcy Court since 2010.

**To: THE HONORABLE ROBERT E. GERBER
UNITED STATES BANKRUPTCY COURT JUDGE**

Atul C. Shah, MD as the Plaintiff and Pro se Litigant is forwarding Response to the Omnibus reply of Wilmington Trust Company dated June 26, 2015 to Dr. Atul Shah's Response with Objection [Docket No. 13244] (The **"Shah Response"**).

Herewith, I am requesting for the following items with this Response to the Omnibus Reply of Wilmington Trust Company as GUC TRUST Administrator dated June 26, 2015.

A. Request for Relief Sought:

Now, I am requesting Honorable Court for the Relief up to Ten Million Plus Dollars as repetitively requested in my Reply and Response Legal Briefs to three Federal Courts including United States Bankruptcy Court as well to the Supreme Court of the United States from 2012 to 2015.

B. This historic Civil Case has Excellent Merits:

This historic and unprecedented Civil Case has National and International Significance with Extraordinary Implementations for the betterment of the Modern Mankind as repetitively mentioned to the three Federal Courts and the Supreme Court of the United States from 2012 to 2015 Legal Briefs and superb articles written by this humble self name as Atul C. Shah, MD or Dr. Shah with this case.

C. Request for Relief Sought and excellent Merits:

I am requesting for the Relief up to Ten Million plus Dollars that is permissible and compatible with the Modern law System and

American Judiciary System as well as American Constitutional Amendments including United States Bankruptcy Court rules.

Also, this historic and unprecedented Civil Case has Excellent Merits and Credibility per the Standard of the American Judiciary System and Constitutional Amendments and the Applicable Laws.

D. Humble Request:

I am humbly requesting to the Honorable Bankruptcy Judge Robert E. Gerber that I am seeking Relief up to **Ten Million plus Dollars.** Also, this historic Civil Case has the Excellent Merits As well as **National and International Significance with Extraordinary Implementations** for the betterment of Modern Mankind in USA, India and other countries.

This is a simple and humble **Response to the Omnibus Reply** of Wilmington Trust Company as GUC Trust Administrator and Trustee dated June 26, 2015 by the Plaintiff Atul C. Shah, MD.

Conclusion

I, Atul C. Shah, respectfully requesting the Honorable United States Bankruptcy Court for seeking Relief up to Ten Million plus Dollars and consider having Excellent Merits with this historical and unprecedented Civil Case.

Respectfully submitted,

Atul C. Shah

Pro Se Litigant

2884 Manorwood Drive

Troy, Michigan

June 29, 2015

Hard Copy and Email Copy forwarded to following Recipients:

1. Honorable Judge Robert E. Gerber at USBC, New York
2. Keith Martorana at Gibson, Dunn & Crutcher LLP, New York
3. Joseph H. Smolinsky Esq. at Weil, Gotshal & Mendes, LLP, New York
4. Jeffrey Rhodes, Esq. Defendant Attorney Dickstein Shapiro, Washington D.C.
5. Colleen Kilfoyle, Esq. Associate Defendant Attorney at Dickstein Shapiro, LLP in New York

HEARING DATE AND TIME: July 1, 2015 at 9:45 a.m. (Eastern Time)

GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, NY 10166-0193
(212) 351-4000
Matthew J. Williams
Lisa H. Rubin
Keith R. Martorana

Attorneys for the Motors Liquidation Company
GUC Trust Administrator

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:
	:
MOTORS LIQUIDATION COMPANY, <i>et al.</i>,	:
f/k/a General Motors Corp., <i>et al.</i>	:
	:
Debtors.	:
	:
-----X	

	Chapter 11 Case No.
	09-50026 (REG)
	(Jointly Administered)

**OMNIBUS REPLY OF WILMINGTON TRUST COMPANY, AS GUC TRUST
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CORRESPONDING AMENDMENTS TO THE GUC TRUST AGREEMENT**